

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

JENNIFER KAPPLER

Plaintiff

vs.

GIVAUDAN FLAVORS CORP.

Defendant

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Case No. C-1-01-630

Judge Speigel

PLAINTIFF'S  
MOTION FOR  
ATTORNEYS FEES

Now comes Plaintiff, and for the reasons set forth in the attached memorandum, requests an award of attorneys fees in the amount of \$50,000.

An affidavit in support of this motion is attached.

Respectfully submitted,



David Torchia - 0015962  
Tobias, Kraus & Torchia  
911 Mercantile Library Bldg.  
414 Walnut Street  
Cincinnati, Ohio 45202  
(513) 241-8137  
Attorney for Plaintiff

**MEMORANDUM**

The above-captioned case has been resolved. Defendant has requested that Plaintiff submit a fee application in support of Plaintiff's request for fees in the amount of \$50,000. Plaintiff has agreed to do so.

As set forth in the attached Affidavit of David Torchia, over 240 hours of legal time were spent on this case by Mr. Torchia. Based on his experience and the well-

accepted study conducted by Judge Rubin in 1983, a rate of \$250 per hour is appropriate.


Based on the foregoing, and pursuant to 42 U.S.C. §1988, Plaintiff requests an award of attorneys fees in the amount of \$50,000.

Respectfully submitted,

  
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David Torchia - 0015962  
Tobias, Kraus & Torchia  
911 Mercantile Library Bldg.  
414 Walnut Street  
Cincinnati, Ohio 45202  
(513) 241-8137  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was hand-delivered to Robin Harvey, Esq. Baker & Hostetler, LLP, 312 Walnut Street, Suite 2650, Cincinnati, Ohio 45202 this 9th day of September, 2003.

  
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David Torchia